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*Proposed Attorneys for the Debtor and
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

GREYLOCK CAPITAL ASSOCIATES,
LLC,

Debtor.

Chapter 11

Case No. 21-22063

**MOTION FOR INTERIM AND FINAL ORDERS (i) AUTHORIZING
CONTINUATION OF HEALTH REIMBURSEMENT ARRANGEMENT
PROGRAM AND PAYMENT OF RELATED PREPETITION OBLIGATIONS
AND (ii) AUTHORIZING BANKS TO HONOR AND PROCESS CHECK
AND ELECTRONIC TRANSFER REQUESTS RELATED THERETO**

The Debtor hereby moves for interim and final orders (i) authorizing it to continue its health reimbursement arrangement (“HRA”) program and the payment of related obligations including those that accrued prepetition (“HRA Obligations”), and (ii) authorizing banks to honor and process checks and electronic transfer requests related thereto, and states:

1. The Debtor commenced this case on January 31, 2021 (“Petition Date”).
2. Information concerning the nature of the Debtor’s business and circumstances leading to its filing can be found in the Declaration of David Steltzer (Doc. #2).
3. The Debtor has paid payroll through January on January 29, 2021, and believes it is current on payroll management fees, wage deductions, trust fund and payroll taxes, health benefit obligations (except HRA Obligations) and 401(k) obligations; and further, does not maintain a formal PTO program or pay insurance obligations in arrears.

4. In the ordinary course of business, the Debtor maintains an HRA program. An HRA is an IRS-approved, employer funded health benefit used to reimburse employees for out of pocket medical expenses. Benefits under the Debtor's HRA program can be paired with its health plan to satisfy expenses not covered by the plan.

5. Benefits under the Debtor's HRA program are provided under a service agreement with a third party administrator which automatically deducts moneys needed to fund HRA Obligations from the Debtor's bank accounts after reimbursement requests have been made and processed.

6. Claims resulting from failure to pay HRA Obligations that accrued prepetition would be entitled to priority under Bankruptcy Code section 507(a)(5). The Debtor does not believe that accrued HRA Obligations as of the Petition Date exceed the statutory cap on a per-employee basis. The above-requested relief is permitted by Bankruptcy Code section 105(a).

WHEREFORE, the Debtor requests that the Court enter the annexed proposed order and grant such other and further relief as the Court deems just and proper.

Dated: January 31, 2021
New York, New York

AMINI LLC

/s/ Jeffrey Chubak
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